

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

PALTALK HOLDINGS, INC.,

Plaintiff,

v.

CISCO SYSTEMS, INC.,

Defendant.

Civil Action No. 6:21-cv-00757

JURY TRIAL DEMANDED

**JOINT NOTICE IDENTIFYING REMAINING OBJECTIONS TO PRETRIAL
DISCLOSURES AND DISPUTES ON MOTIONS *IN LIMINE***

In accordance with the Court’s March 2, 2023, Scheduling Order (ECF 105), Plaintiff Paltalk Holdings, Inc., (“Paltalk”) and Defendant Cisco Systems, Inc., (“Cisco”) (collectively, the “Parties”) have met and conferred to discuss their respective objections to pretrial disclosures and disputes on motions *in limine*.

By and through their undersigned counsel, the parties provide the following joint notice:

I. Objections to Paltalk’s Proposed Exhibits

Cisco’s current objections to Paltalk’s proposed exhibits are set forth in Exhibit D-1 which is attached to the parties’ joint pretrial order. ECF 122-5.

II. Objections to Cisco’s Proposed Exhibits

Paltalk’s current objections to Cisco’s proposed exhibits are set forth in Exhibit D-2 which is attached to the parties’ joint pretrial order. ECF 122-6.

III. Objections to Cisco’s Proposed Witnesses

Paltalk’s current objections to Cisco’s proposed witnesses are set forth in Exhibit E-3 which is attached to the parties’ joint pretrial order. ECF 122-9.

IV. Objections to Paltalk's Deposition Designations

Cisco's current objections to Paltalk's deposition designations (and Paltalk's objections to Cisco's counter-designations) are set forth in Exhibit F-1 which is attached to the parties' joint pretrial order. ECF 122-10.

V. Objections to Cisco's Deposition Designations

Paltalk's current objections to Cisco's deposition designations (and Cisco's objections to Paltalk's counter-designations) are set forth in Exhibit F-2 which is attached to the parties' joint pretrial order. ECF 122-11.

VI. Proposed Preliminary Jury Instructions

The parties' requested preliminary jury instructions are set forth in Exhibit G-1 which is attached to the parties' joint pretrial order. ECF 122-12.

VII. Proposed Final Jury Instructions

The parties' requested final jury instructions are set forth in Exhibit G-2 which is attached to the parties' joint pretrial order. ECF 122-13.

VIII. Proposed Verdict Forms

The parties' proposed verdict forms are set forth in Exhibits J-1 (Paltalk) and J-2 (Cisco) which are attached to the parties' joint pretrial order. ECF 122-17; 122-18.

IX. Disputes on Motions *in Limine*

The parties' Joint and Disputed Motions *in Limine* is attached as **Exhibit 1**. This revised version reflects the parties' resolution of the following motions *in limine*:

- Paltalk's MIL #3. Cisco agrees that it will not elicit testimony or argue as to any evidence, reference, or argument related to any content contained in any chat rooms hosted by Paltalk.

All other objections and motions *in limine* remain disputed as indicated in the Parties' Proposed Joint Pretrial Order, ECF No. 122. The parties will continue to meet and confer in good faith in an effort to resolve their remaining disputes.

By: /s/ Max L. Tribble, Jr.

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CERTIFICATE OF SERVICE

I certify that counsel of record are being served with a copy of this document and all attachments via the Court's CM/ECF system on June 26, 2023.

/s/ Bryce T. Barcelo
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Counsel for Plaintiff